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LETTER REGARDING U S EPA REGION VI REVIEW AND COMMENTS ON COMPREHENSIVE SITE ASSESSMENT FOR BASE SERVICE STATION NAS FORT WORTH TX
6/28/1994
U S EPA REGION VI

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NAVAL AIR STATION FORT WORTH JRB CARSWELL FIELD TEXAS

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 141

File:
D.B. 17A-22

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JUN 28 1994

Frank G. Grey, Jr., P.E.
Chief Environmental Engineer
AFBCA/OL-H
Bldg. 1215 S. Warehouse Road
Carswell AFB, TX 76127

Dear Mr. Grey:

Please find enclosed the Environmental Protection Agency's review comments on the Comprehensive Site Assessment Report for the Base Service Station. The report provides a good comprehensive look at the extent of contamination.

There are a number of recommendations discussed in Section IV of the report. It is unclear from the report if a schedule for implementing the recommendations has been developed. I would like to discuss the timing of future work on the Base Service Station at your earliest convenience.

Sincerely,

Gary A. Baumgarten
Project Manager

Enclosure

cc: Cecil Irby, TNRCC

EPA Review Comments
Comprehensive Site Assessment Report - Base Service Station
Carswell Air Force Base

Page II-2: For September 1992, the chronology states that soil contained 51.2 ppm at 3 feet and 10.6 ppm at 17.5 feet. What constituent is associated with the stated concentrations?
For April 1993, why did TWC request that completion of recovery system be halted?

Page III-2, Soil Sample Analytical Results: Why was TCLP for toluene, ethylbenzene and xylene conducted if there are not TCLP regulatory values for these compounds?
Was analysis for BTEX in ppm or ppb conducted for soil boring ST16-1, ST16-2, and ST16-3?

Page III-4, Soil Gas Survey: To assist the reader and keep from having to refer to Appendix A, it is recommended that Figure 1 from the soil gas survey report be included in the body of the site assessment report. The figure provides a good visual for the lack of definition of a plume in the middle of the site.

Page IV-6, First Paragraph: The last sentence in this paragraph does not make sense as written. The sentence in the paragraph currently reads: **It is unlikely the surface water discharging to the West Fork of the Trinity River along this surface drainage path is remains impacted by the BSS release.**

Page IV-7, Second Paragraph: Please state the basis for the statement that, "It appears contamination extends only to the base of the upper groundwater zone occurring in the alluvial deposits on CAFB and not to the much greater depths within the Paluxy Formation where the area's drinking supply wells are developed", since the previous sentence states that the vertical extent of groundwater contamination has not been determined.

Page IV-8, Recommendations, Off-Site Migration: Due to the high levels of BTEX detected in SED-1A, it seems appropriate to take additional samples along the West Fork Trinity River to determine if contamination from the Base Service Station has migrated downstream and is present in the soils/sediments.

In addition, it is stated in the report that it is not known at what concentrations the groundwater is discharging to the river itself. Additional surface water sampling should be conducted to determine if surface water quality criteria are being exceeded.

Page IV-9, Recommendations, Risk Assessment: It is agreed that the source of contamination should be eliminated or reduced and that concentrations of contaminants migrating off-site should be mitigated. However, the risk assessment should not be delayed until the source is removed and offsite migration mitigated. The risk assessment will be useful in setting treatment levels for soils, and groundwater if required.

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